

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Reliance Insurance Co.

Plaintiff

vs.

William Ray Miller, II

Defendant

Case No. 1:97-CV-03194-MJG

\* \* \* \* \*

**MOTION TO STAY EXECUTION ON JUDGMENT**

Comes now the Defendant, William Ray Miller, II by and through his attorneys James R. Schraf and Logan Russack, LLC and moves this honorable Court to stay execution on the judgment entered in this case and for his reasons states as follows:

1. A judgment was entered against this Defendant on July 13, 2000 in the principal amount of \$472,500 plus prejudgment interest in the amount of \$89,145.

2. Since the time of the judgment the Plaintiff has pursued various enforcement activities including deposing Mr. Miller and Donna Mannino in aid of enforcement and issuing subpoenas to certain financial institutions seeking records.

3. The case was stayed for a lengthy period of time due to the filing of a Chapter 7 Bankruptcy petition by the Defendant.

4. Over the course of January and February 2007 the parties have engaged in settlement discussions that have resulted in a written offer being made for the settlement of this matter by Mr. Miller to Reliance. That offer, made on February 7, 2007, was rejected by the Plaintiff on February 22, 2007.

5. At the request of this Defendant, this Court referred the case to the Honorable Paul W. Grimm, United States Magistrate Judge in order to convene and conduct a settlement conference.

6. Judge Grimm has issued an order scheduling the matter for a settlement conference on July 13, 2007.

7. The Defendant instituted settlement discussions and has made an offer in good faith to resolve this matter and is willing to continue discussions.

8. The Defendant believes that his resources are better served pursuing a resolution of this matter rather than defending further enforcement action between now and the settlement conference.

Wherefore, the Defendant respectfully requests that this honorable Court stay execution on the judgment pending completion of the settlement conference.

\_\_\_\_\_/s/\_\_\_\_\_  
James R. Schraf 03470  
Logan Russack, LLC  
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Annapolis, Maryland 21401  
(410) 571-2780  
Attorneys for William Ray Miller, II

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Stay Execution on Judgment was mailed by first class mail postage prepaid this 1st day of May, 2007 to:

John F. Dougherty, Esquire  
Kramon & Graham, P.A.  
One South Street, Suite 2600  
Baltimore, Maryland 21202-1269  
Attorney for Plaintiff, Reliance Insurance Co.

\_\_\_\_\_/s/\_\_\_\_\_  
James R. Schraf 03470